



EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

Division of Drinking Water

January 22, 2016

System No. 0310002

Gene Mancebo  
General Manager  
Amador Water Agency  
12800 Ridge Road  
Sutter Creek, CA 95685

### AWA IONE - TRANSMITTAL OF COMPLIANCE ORDER NO. 01-10-16R-002

Dear Mr. Mancebo,

The Amador Water Agency's (AWA) lone water system is in violation of Section 64536(a) of the California Code of Regulations, Disinfection Byproduct Precursor Treatment Technique requirements.

In response to this violation, the State Water Resources Control Board - Division of Drinking Water (Division) has issued Compliance Order No. 01-10-16R-002. The Compliance Order is being transmitted to the AWA under cover of this letter.

Please respond to the directives of this Compliance Order by the deadlines established with each item. If you have any questions regarding this Compliance Order, please contact Tahir Mansoor of this office by email at [Tahir.Mansoor@Waterboards.ca.gov](mailto:Tahir.Mansoor@Waterboards.ca.gov), or by phone at (209) 948-3879.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard L. Hinrichs".

Richard L. Hinrichs, P.E., Chief  
Northern California Section  
Division of Drinking Water  
State Water Resources Control Board

Certified Mail No. 7012 3460 0003 1113 2202

Attachments: Compliance Order

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FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

31 E. Channel Street, Room 270, Stockton, CA 95202 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)

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2  
3 **STATE OF CALIFORNIA**  
4 **STATE WATER RESOURCES CONTROL BOARD**  
5 **DIVISION OF DRINKING WATER**  
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7

8 **IN RE:** Amador Water Agency lone Water System  
9 Water System No. 0310002  
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12 **TO:** Gene Mancebo, General Manager  
13 Amador Water Agency  
14 12800 Ridge Road  
15 Sutter Creek, CA 95685  
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18 **COMPLIANCE ORDER NO. 01-10-16R-002**  
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21 **FOR NONCOMPLIANCE OF TREATMENT TECHNIQUE FOR CONTROL OF**  
22 **DISINFECTION BYPRODUCT PRECURSORS (DBPP)**  
23 **SECTION 64536, TITLE 22, CALIFORNIA CODE OF REGULATIONS**  
24

25  
26 **Issued on January 22, 2016**  
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28 Section 116655 of the California Health and Safety Code (hereinafter, "CHSC")  
29 authorizes the issuance of a compliance order to a public water system for violation of  
30 the California Safe Drinking Water Act (Health and Safety Code, Division 104, Part 12,  
31 Chapter 4, commencing with Section 116270) (hereinafter, "California SDWA"), or any  
32 regulation, standard, permit or order issued or adopted thereunder.  
33

34 The State Water Resources Control Board (hereinafter, "State Board"), acting by  
35 and through its Division of Drinking Water (hereinafter, "Division") and the Deputy  
36 Director for the Division (hereinafter, "Deputy Director"), hereby issues a compliance  
37 order to the Amador Water Agency's (hereinafter, AWA) lone water system for  
38 violation of California Code of Regulations (hereinafter, "CCR"), Section 64536,

1 Treatment technique for control of disinfection byproduct precursors (hereinafter,  
2 "DBPP").

3  
4 **APPLICABLE AUTHORITIES**

5  
6 **Section 116655, California SDWA, states in relevant part:**

7 (a) Whenever the Division determines that any person has violated or is violating this  
8 chapter, or any permit, regulation, or standard issued or adopted pursuant to this  
9 chapter, the director may issue an order doing any of the following:

10 (1) Directing compliance forthwith.

11 (2) Directing compliance in accordance with a time schedule set by the Division.

12 (3) Directing that appropriate preventive action be taken in the case of a  
13 threatened violation.

14 (b) An order issued pursuant to this section may include, but shall not be limited to,  
15 any or all of the following requirements:

16 (1) That the existing plant, works, or system be repaired, altered, or added to.

17 (2) That purification or treatment works be installed.

18 (3) That the source of the water supply be changed.

19 (4) That no additional service connection be made to the system.

20 (5) That the water supply, the plant, or the system be monitored.

21 (6) That a report on the condition and operation of the plant, works, system, or  
22 water supply be submitted to the Division.

23  
24 **Section 116555(a)(3), CHSC, states in relevant part:**

25 (a) Any person who owns a public water system shall ensure that the system does all  
26 of the following:



(3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.

**Section 64536(a), Title 22, CCR, states in relevant part:**

(a) Systems using approved surface water and conventional filtration treatment shall meet any one of the alternative compliance criteria in paragraphs (1) through (6) to comply with this article or comply with the requirements of section 64536.2. Systems that meet one of the criteria in paragraphs (1) through (6) shall still comply with monitoring requirements in section 64534.6.

(1) The system's source water TOC level is less than 2.0 mg/L, calculated quarterly as a running annual average.

(2) The system's treated water TOC level is less than 2.0 mg/L, calculated quarterly as a running annual average.

(3) The system's source water TOC level is less than 4.0 mg/L, calculated quarterly as a running annual average; the source water alkalinity is greater than 60 mg/L (as CaCO<sub>3</sub>), calculated quarterly as a running annual average; and either

*Additional Applicable Authorities* are located in **Attachment A**, which is attached hereto and incorporated by reference.

**STATEMENT OF FACTS**

The lone water system is one of the large water systems operated by AWA in Amador County. The system serves treated surface water to the City of lone and the Mule Creek State Prison. The lone system serves a population of about 5,339 through 1,618 service connections. The most recent permit to this water system was granted by the Division on December 15, 1995, to include the new surface water treatment



1 plant, and a new storage tank, which is located near the Preston Youth Correctional  
2 Facility in lone. Conventional treatment technology is used for removing turbidity and  
3 microbial contaminants at the lone plant. Treatment includes pretreatment steps of  
4 chemical coagulation, in-line static mixing, flocculation, and tube-settler clarification  
5 followed by gravity filtration. Disinfection is provided during pre-treatment and post-  
6 filtration for inactivation of pathogens. Corrosion control is provided, post-filtration, for  
7 protection of the distribution system pipeline.

8  
9 The system's sole surface water source is the lone Reservoir. The lone reservoir is  
10 the tail end of the AWA transmission system that originates at the Tiger Creek  
11 afterbay, on the North Fork of the Mokelumne River. The river water is diverted  
12 through reservoirs, tunnels, and ditches before it reaches the Tanner reservoir. From  
13 the Tanner Reservoir the water is transported in a pipeline to the lone reservoir. Raw  
14 water is siphoned over the reservoir impoundment using a 10-inch diameter steel  
15 transmission pipeline that gravity feeds the plant. Flow through the plant is regulated  
16 by an 8-inch hydropneumatic valve located on the influent pipeline.

17  
18 Section 64536, Title 22, CCR, established treatment technique requirements for  
19 disinfection byproduct precursors which require the removal of specified percentages  
20 of organic materials, measured as total organic carbon (hereinafter, "TOC") that may  
21 react with disinfectants to form DBPs. Removal is achieved through a treatment  
22 technique (enhanced coagulation or enhanced softening) unless a system meets the  
23 alternative criteria.

24  
25 Pursuant to Section 64534.6(a), the AWA is required to take paired TOC (source water  
26 and treated water) samples and one source water alkalinity sample per month at a  
27 time representative of normal operating conditions and influent water quality. TOC



and alkalinity in the source water shall be monitored prior to any treatment and at the same time as TOC monitoring in the treated water. TOC in the treated water shall be monitored no later than the point of combined filter effluent turbidity monitoring and shall be representative of the treated water.

These regulations require that water systems using a conventional filtration treatment process for surface waters achieve acceptable levels of TOC removal at their treatment plant. In accordance with Section 64534.6(b), Title 22, CCR, a system that maintains an average treated water TOC of less than 2.0 mg/L for two consecutive years may reduce monitoring for both TOC and alkalinity to one paired TOC sample and one source water alkalinity sample per plant per quarter. The AWA met the above requirement and had been collecting the TOC samples quarterly.

For the period July 2015 through October 2015, the AWA did not meet the performance standard of treated water TOC of less than 2.0 mg/L as required by Section 64536(a), Title 22, CCR. The running annual average (hereinafter, "RAA") for treated water TOC was 2.2 mg/L. This constitutes a violation of treatment technique requirements for disinfection byproduct precursors.

The following is a summary of TOC quarterly monitoring results for the period January 2015 through October 2015.

Month		Sample Date <sup>1</sup>	Source Water Alkalinity (mg/L)	Source Water TOC (mg/L)	Treated Water TOC (mg/L)
Current Year	Jan	1/5/15	14	3.3	2.6
	Feb				
	Mar				
	Apr Ave	4/3/15, 4/27/15	17	2.5	2.2
	May				
	Jun				

Jul	7/6/15	13	2.3	1.7
Aug				
Sep				
Oct	10/14/15	43	2.9	2.4
Nov				
Dec				
Running Annual Average (RAA)		22	2.8	2.2

## **DETERMINATIONS**

Based on the above findings, the Division has determined that the AWA has failed to comply with the disinfection byproduct precursor treatment technique requirement for the period July 2015 through October 2015 by not meeting the performance standard of treated water TOC of less than 2.0 mg/L as required by Section 64536(a), Title 22, CCR.

## **DIRECTIVES**

To ensure that the water supplied by the AWA is at all times safe, wholesome, healthful, and potable, the AWA is ordered to take the following actions:

- 1 Cease and Desist from failing to comply with Section 64536(a), Title 22, CCR, by ensuring that the system is provided with a reliable and adequate supply of pure, wholesome, healthful, and potable water, which is in compliance with all primary drinking water standards.
- 2 The AWA shall submit a written response by **February 26, 2016**, indicating its willingness to comply with the directives of this Compliance Order.



3. The AWA shall provide quarterly public notification of its inability to meet the disinfection byproduct precursor treatment technique requirements during any month that the treated water TOC is not less than 2.0 mg/L using **Attachment B**. The first notification for the TOC DBPP violation that occurred during the period July 2015 through October 2015 shall be provided by **February 26, 2016**.

Commencing on the date of service of this Order, submit proof of each public notification conducted in compliance with the Directive, within 10 days following each notification using the form provided as **Attachment C**.

The public notice can be provided in the local newspaper to reach persons served by the AWA.

4. The AWA shall now conduct monthly sampling for disinfection byproduct precursors utilizing monthly-paired samples of the raw and treated water TOC and a raw water alkalinity sample. The analytical results shall be reported to the Division no later than the 10<sup>th</sup> day following the month in which the sample was collected.

5. By **April 29, 2016**, the AWA shall submit a corrective action plan that describes how the DBPP levels will be adequately reduced to achieve compliance.

6. The AWA shall operate the water treatment plant to minimize formation of total trihalomethanes and haloacetic acids.

7. Submit quarterly progress reports to the Division. The first quarterly progress report shall describe progress made in the 1st quarter of 2016 and shall be



submitted to the Division by **April 15, 2016**, using the form provided as **Attachment D**.

8. By no later than **December 31, 2018**, the AWA shall achieve compliance with the disinfection byproduct precursor treatment technique requirement, with the completion of a project and demonstration that the running annual average of TOC Percent removal ratio is 1.00 or greater. The AWA shall provide written notification of the date that compliance is achieved, no later than ten days following receipt of the laboratory sampling results.

All submittals required by this Order shall be addressed to:

Bhupinder S. Sahota, P.E.,  
Senior Sanitary Engineer  
Division of Drinking Water  
State Water Resources Control Board  
31 E. Channel Street, Room 270  
Stockton, CA 95202

The Division reserves the right to make such modifications to this Order as it may deem necessary to protect public health and safety. Such modifications may be issued as amendments to this Order and shall be effective upon issuance. Nothing in this Compliance Order relieves the AWA of its obligation to meet the requirements of the California SDWA, or any regulation, standard, permit or order issued thereunder.

If the AWA is unable to perform the tasks specified in this Order for any reason, whether within or beyond its control, and if the AWA notifies the Division in writing no less than five days in advance of the due date, the Division may extend the time for performance if the AWA demonstrates that it has used its best efforts to comply with the schedule and other requirements of this Order.



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**PARTIES BOUND**

This Compliance Order shall apply to and be binding upon the AWA, its owners, shareholders, officers, directors, agents, employees, contractors, successors, and assignees.

**SEVERABILITY**

The directives of this Compliance Order are severable, and the AWA shall comply with each and every provision thereof notwithstanding the effectiveness of any provision.



**FURTHER ENFORCEMENT ACTION**

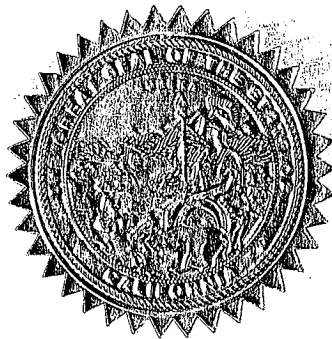
The California SDWA authorizes the Division to issue citations and compliance orders with assessment of administrative penalties to a public water system for violation or continued violation of the requirements of the California SDWA or any permit, regulation, permit or order issued or adopted thereunder including, but not limited to, failure to correct a violation identified in a citation or compliance order. The California SDWA also authorizes the Division to take action to suspend or revoke a permit that has been issued to a public water system if the system has violated applicable law or regulations or has failed to comply with an order of the Division; and to petition the superior court to take various enforcement measures against a public water system that has failed to comply with an order of the Division. The Division does not waive any further enforcement action by issuance of this compliance order.

1/22/2016

Date

Richard L. Hinrichs

Richard L. Hinrichs, P.E., Chief  
Northern California Section  
Division of Drinking Water  
State Water Resources Control Board



**Attachments:**

Attachment A:	Applicable Authorities
Attachment B:	Public Notification Form
Attachment C:	Proof of Notification Form
Attachment D:	Quarterly Progress Report Form

Certified Mail No. 7012 3460 0003 1113 2202

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Applicable Authorities

Violation of Disinfection Byproduct Precursors (DBPP)

**§116655. Orders.**

(a) Whenever the department determines that any person has violated or is violating this chapter, or any permit, regulation, or standard issued or adopted pursuant to this chapter, the director may issue an order doing any of the following:

- (1) Directing compliance forthwith.
- (2) Directing compliance in accordance with a time schedule set by the department.
- (3) Directing that appropriate preventive action be taken in the case of a threatened violation.

(b) An order issued pursuant to this section may include, but shall not be limited to, any or all of the following requirements:

- (1) That the existing plant, works, or system be repaired, altered, or added to.
  - (2) That purification or treatment works be installed.
  - (3) That the source of the water supply be changed.
  - (4) That no additional service connection be made to the system.
  - (5) That the water supply, the plant, or the system be monitored.
  - (6) That a report on the condition and operation of the plant, works, system, or water supply be submitted to the department.
- 

**§116555. Operational requirements.**

(a) Any person who owns a public water system shall ensure that the system does all of the following:

- (1) Complies with primary and secondary drinking water standards.
- (2) Will not be subject to backflow under normal operating conditions.
- (3) Provides a reliable and adequate supply of pure, wholesome, healthful, and potable water.
- (4) Employs or utilizes only water treatment operators or water treatment operators-in-training that have been certified by the department at the appropriate grade.
- (5) Complies with the operator certification program established pursuant to Chapter 4 (commencing with Section 106875).

(b) Any person who owns a community water system or a nontransient noncommunity water system shall do all of the following:

- (1) Employ or utilize only water distribution system operators who have been certified by the department at the appropriate grade for positions in responsible charge of the distribution system.
  - (2) Place the direct supervision of the water system, including water treatment plants, water distribution systems, or both under the responsible charge of an operator or operators holding a valid certification equal to or greater than the classification of the treatment plant and the distribution system.
- 

***Article 5. Treatment technique for control of disinfection byproduct precursors (DBPP)***

**§64536. Alternative Compliance Criteria to the Enhanced Coagulation and Enhanced Softening Performance Requirements.**

(a) Systems using approved surface water and conventional filtration treatment shall meet any one of the alternative compliance criteria in paragraphs (1) through (6) to comply with this article or comply with

the requirements of section 64536.2. Systems that meet one of the criteria in paragraphs (1) through (6) shall still comply with monitoring requirements in section 64534.6.

(1) The system's source water TOC level is less than 2.0 mg/L, calculated quarterly as a running annual average.

(2) The system's treated water TOC level is less than 2.0 mg/L, calculated quarterly as a running annual average.

(3) The system's source water TOC level is less than 4.0 mg/L, calculated quarterly as a running annual average; the source water alkalinity is greater than 60 mg/L (as CaCO<sub>3</sub>), calculated quarterly as a running annual average; and either

(A) The TTHM and HAA5 running annual averages are no greater than 0.040 mg/L and 0.030 mg/L, respectively; or

(B) Prior to the applicable compliance date in section 64530(a) or (b), the system has applied to the State Board for the approval of, and committed funds to the installation of, technologies that will limit the levels of TTHM and HAA5 to no more than 0.040 mg/L and 0.030 mg/L, respectively. The application to the State Board shall include a description of the technology to be installed, evidence of a commitment to complete the installation, such as a signed contract, bid solicitation, or approved bond measure, and a schedule containing milestones and periodic progress reports for installation and operation of the technology. These technologies shall be installed and operating not later than June 30, 2005.

(4) The TTHM and HAA5 running annual averages are no greater than 0.040 mg/L and 0.030 mg/L, respectively, and the system uses only chlorine for primary disinfection and maintenance of a residual in the distribution system.

(5) The system's source water SUVA, prior to any treatment and measured monthly, is less than or equal to 2.0 L/mg-m, calculated quarterly as a running annual average.

(6) The system's finished water SUVA, measured monthly, is less than or equal to 2.0 L/mg-m, calculated quarterly as a running annual average.

(b) Systems using approved surface water and conventional filtration treatment and practicing softening that cannot achieve the TOC removal required by section 64536.2(a) shall meet any one of the criteria in paragraphs (1) through (2) below or any one of the criteria in section 64536(a), paragraphs (1) through (6) to comply with this article. Systems that meet one of the criteria in paragraphs (1) through (2) below or one of the criteria in section 64536(a), paragraphs (1) through (6) shall still comply with the monitoring requirements in section 64534.6.

- (1) Softening that results in lowering the treated water alkalinity to less than 60 mg/L (as CaCO<sub>3</sub>), measured monthly and calculated quarterly as a running annual average; or
- (2) Softening that results in removing at least 10 mg/L of magnesium hardness (as CaCO<sub>3</sub>), measured monthly and calculated quarterly as an annual running average.

#### **§64536.6. Disinfection Byproduct Precursors Public Notification Requirements.**

For systems using conventional treatment, enhanced coagulation or enhanced softening are identified as treatment techniques to control the level of disinfection byproduct precursors in drinking water treatment and distribution systems. If a system fails to comply with the enhanced coagulation or enhanced softening requirements established in this article, the system shall notify the public pursuant to sections 64463, 64463.4, and 64465, including language in appendix 64465-G, in addition to reporting to the State Board pursuant to sections 64537 through 64537.6.

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#### **§64463.4. Tier 2 Public Notice**

- (a) A water system shall give public notice pursuant to this section if any of the following occurs:
  - (1) Any violation of the MCL, MRDL, and treatment technique requirements, except:
    - (A) Where a Tier 1 public notice is required under section 64463.1; or
    - (B) Where the Department determines that a Tier 1 public notice is required, based on potential health impacts and persistence of the violations;
  - (2) All violations of the monitoring and testing procedure requirements in sections 64421 through 64426.1, article 3 (Primary Standards – Bacteriological Quality), for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations;
  - (3) Other violations of the monitoring and testing procedure requirements in this chapter, and chapters 15.5, 17 and 17.5, for which the Department determines that a Tier 2 rather than a Tier 3 public notice is required, based on potential health impacts and persistence of the violations; or
  - (4) Failure to comply with the terms and conditions of any variance or exemption in place.
- (b) A water system shall give the notice as soon as possible within 30 days after it learns of a violation or occurrence specified in subsection (a), except that the water system may request an extension of up to 60 days for providing the notice. This extension would be subject to the Department's written approval based on the violation or occurrence having been resolved and the Department's determination that public health and welfare would in no way be adversely affected. In addition, the water system shall:
  - (1) Maintain posted notices in place for as long as the violation or occurrence continues, but in no case less than seven days;
  - (2) Repeat the notice every three months as long as the violation or occurrence continues. Subject to the Department's written approval based on its determination that public health would in no way be adversely affected, the water system may be allowed to notice less frequently but in no case less than once per year. No allowance for reduced frequency of notice shall be given in the case of a total coliform MCL violation or violation of a Chapter 17 treatment technique requirement; and
  - (3) For turbidity violations pursuant to sections 64652.5(c)(2) and 64653(c), (d) and (f), as applicable, a water system shall consult with the Department as soon as possible within 24 hours after the water system learns of the violation to determine whether a Tier 1 public notice is required. If consultation does not take place within 24 hours, the water system shall give Tier 1 public notice within 48 hours after learning of the violation.
- (c) A water system shall deliver the notice, in a manner designed to reach persons served, within the required time period as follows:
  - (1) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, community water systems shall give public notice by;

(A) Mail or direct delivery to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system; and

(B) Use of one or more of the following methods to reach persons not likely to be reached by a mailing or direct delivery (renters, university students, nursing home patients, prison inmates, etc.):

1. Publication in a local newspaper;
2. Posting in conspicuous public places served by the water system, or on the Internet; or
3. Delivery to community organizations.

(2) Unless otherwise directed by the Department in writing based on its assessment of the violation or occurrence and the potential for adverse effects on public health and welfare, noncommunity water systems shall give the public notice by:

(A) Posting in conspicuous locations throughout the area served by the water system; and

(B) Using one or more of the following methods to reach persons not likely to be reached by a public posting:

1. Publication in a local newspaper or newsletter distributed to customers;
2. E-mail message to employees or students;
3. Posting on the Internet or intranet; or
4. Direct delivery to each customer.

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#### **§64469 Reporting Requirements**

(d) Within 10 days of giving initial or repeat public notice pursuant to Article 18 of this Chapter, except for notice given under 64463.7(d), each water system shall submit a certification to the Department that it has done so, along with a representative copy of each type of public notice given.

## Instructions for Tier 2 Stage 1 DBPR DBP Precursor Treatment Notice Template

### Template Attached

Since disinfection byproduct (DBP) precursor treatment technique violations are included in Tier 2, you must provide public notice to persons served as soon as practical but within 30 days after you learn of the violation [California Code of Regulations, Title 22, Chapter 15, Section 64463.4(b)]. Some disinfection problems may be serious. **Each water system required to give public notice must submit the notice to the State Water Resources Control Board, Division of Drinking Water (DDW) for approval prior to distribution or posting, unless otherwise directed by the DDW [64463(b)].**

### Notification Methods

You must use the methods summarized in the table below to deliver the notice to consumers. If you mail, post, or hand deliver, print your notice on letterhead, if available.

<i>If You Are a...</i>	<i>You Must Notify Consumers by...</i>	<i>...and By One or More of the Following Methods to Reach Persons Not Likely to be Reached by the Previous Method...</i>
Community Water System [64463.4(c)(1)]	Mail or direct delivery <sup>(a)</sup>	Publication in a local newspaper
		Posting <sup>(b)</sup> in conspicuous public places served by the water system or on the Internet
		Delivery to community organizations
Non-Community Water System [64463.4(c)(2)]	Posting in conspicuous locations throughout the area served by the water system <sup>(b)</sup>	Publication in a local newspaper or newsletter distributed to customers
		Email message to employees or students
		Posting <sup>(b)</sup> on the Internet or intranet
		Direct delivery to each customer

(a) Notice must be distributed to each customer receiving a bill including those that provide their drinking water to others (e.g., schools or school systems, apartment building owners, or large private employers), and other service connections to which water is delivered by the water system.

(b) Notice must be posted in place for as long as the violation or occurrence continues, but in no case less than seven days.

The notice attached is appropriate for the methods described above. However, you may wish to modify it before using it for posting in public places served by the water system. If you do, you must still include all the required elements and leave the health effects and notification language in italics unchanged. This language is mandatory [64465].

## Multilingual Requirement

The notice must (1) be provided in English, Spanish, and the language spoken by any non-English-speaking group exceeding 10 percent of the persons served by the water system and (2) include a telephone number or address where such individuals may contact the water system for assistance.

If any non-English-speaking group exceeds 1,000 persons served by the water system, but does not exceed 10 percent served, the notice must (1) include information in the appropriate language(s) regarding the importance of the notice and (2) contain the telephone number or address where such individuals may contact the water system to obtain a translated copy of the notice from the water system or assistance in the appropriate language.

## Population Served

Make sure it is clear who is served by your water system -- you may need to list the areas you serve.

## Description of the Violation

Choose from the following descriptions of violations and modify to fit your situation.

- Step 1 (or Step 2) TOC Removal – “We routinely monitor for Total Organic Carbon (TOC) in our source and treated water and alkalinity in our source water. This information tells us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, we achieved [number – number]% removal of TOC and were required to achieve [number – number]% removal of TOC. As we did not achieve the required removal of TOC, as an average over the past 12 months, we did not demonstrate effective DBP precursor removal.”
- Alternative Compliance Criteria<sup>1</sup>
  - Source Water TOC – “We routinely monitor for Total Organic Carbon (TOC) in our source water. This measurement tell us whether the natural organic matter in our source water is low enough so that no further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source water TOC varied from [number – number] mg/L and resulted in an annual average of [number] mg/L. The standard is that the source water TOC level must be less than 2.0 mg/L.”

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<sup>1</sup> Suggested language for systems that practice softening is not provided as there are no systems in California that practice softening.

- Treated Water TOC – “We routinely monitor for Total Organic Carbon (TOC) in our treated water. This measurement tell us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our treated water TOC varied from [number – number] mg/L and resulted in an annual average of [number] mg/L. The standard is that the treated water TOC level must be less than 2.0 mg/L.”
- Source Water TOC, Source Water Alkalinity, and Distribution System TTHM and HAA5 – “We routinely monitor for Total Organic Carbon (TOC) and alkalinity in our source and total trihalomethanes (TTHM) and haloacetic acids (five) (HAA5) in our distribution system. These measurements tell us whether or not further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source and distribution system monitoring had the results shown in the table below. We met [number] of [number] standards. We are required to meet all the standards.”

Parameter	Results		
	Range (mg/L)	Average (mg/L)	Standard (mg/L)
TOC	[number – number]	[number]	Less than 4.0
Alkalinity	[number – number]	[number]	Greater than 60
TTHM	[number – number]	[number]	No Greater Than 0.040
HAA5	[number – number]	[number]	No Greater Than 0.030

- Source Water SUVA – “We routinely monitor for Specific Ultraviolet Absorbance (SUVA) in our source. This measurement tell us whether the natural organic matter in our source water is low enough so that no further treatment is needed to remove disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our source water SUVA varied from [number – number] L/mg-m and resulted in an annual average of [number] L/mg-m. The standard is that the source water SUVA level must be less than or equal to 2.0 L/mg-m.”
- Treated Water SUVA – “We routinely monitor for Specific Ultraviolet Absorbance (SUVA) in our treated water. This measurement tells us whether we are effectively removing disinfection byproduct (DBP) precursors from the water supply. During the past 12 months, our treated water SUVA varied from [number – number] L/mg-m and resulted in an annual average of [number] L/mg-m. The standard is that the treated water SUVA level must be less than or equal to 2.0 L/mg-m.”

### Corrective Action

In your notice, describe corrective actions you are taking. Listed below are some steps commonly taken by water systems with DBP precursor treatment technique violations. Use one or more of the following actions, if appropriate, or develop your own:

- “We added [chemicals or a new treatment process] to improve DBP precursor removal.”
- “We changed our chemical dosing to improve DBP precursor removal.”
- “We removed the source from use.”

### **After Issuing the Notice**

Send a copy of each type of notice and a certification that you have met all the public notice requirements to the DDW within ten days after you issue the notice [64469(d)]. You should also issue a follow-up notice in addition to meeting any repeat notice requirements the DDW sets.

It is recommended that you notify health professionals in the area of the violation. People may call their doctors with questions about how the violation may affect their health, and the doctors should have the information they need to respond appropriately.

It is a good idea to issue a “problem corrected” notice when the violation is resolved.

## **IMPORTANT INFORMATION ABOUT YOUR DRINKING WATER**

Este informe contiene información muy importante sobre su agua potable.  
Tradúzcalo o hable con alguien que lo entienda bien.

### **[System]**

### **Did Not Meet Treatment Requirement (Disinfection Byproduct Precursors)**

Our water system recently violated a drinking water standard. Although this is not an emergency, as our customers, you have a right to know what you should do, what happened, and what we are doing to correct this situation.

[Describe the violation - use descriptions from instructions].

#### **What should I do?**

- **You do not need to boil your water or take other actions.**
- This is not an emergency. If it had been, you would have been notified immediately.
- *Total organic carbon (TOC) has no health effects. However, total organic carbon provides a medium for the formation of disinfection byproducts. These byproducts include trihalomethanes (THMs) and haloacetic acids (HAAs). Drinking water containing these byproducts in excess of the MCL may lead to adverse health effects, liver or kidney problems, or nervous system effects, and may lead to an increased risk of getting cancer.*
- [Option for water systems: Water systems may wish to include a statement describing their compliance with THM/HAA5 requirements, if applicable].
- If you have other health issues concerning the consumption of this water, you may wish to consult with your doctor.

#### **What happened? What is being done?**

[Describe corrective action]. [TOC, SUVA, TTHM, HAA5, etc.] so far this [time period] have met all requirements.

For more information, please contact [name of contact] at [phone number] or [mailing address].

*Please share this information with all the other people who drink this water, especially those who may not have received this notice directly (for example, people in apartments, nursing homes, schools, and businesses). You can do this by posting this public notice in a public place or distributing copies by hand or mail.*

## Secondary Notification Requirements

Upon receipt of notification from a person operating a public water system, the following notification must be given within 10 days [Health and Safety Code Section 116450(g)]:

- SCHOOLS: Must notify school employees, students, and parents (if the students are minors).
- RESIDENTIAL RENTAL PROPERTY OWNERS OR MANAGERS (including nursing homes and care facilities): Must notify tenants.
- BUSINESS PROPERTY OWNERS, MANAGERS, OR OPERATORS: Must notify employees of businesses located on the property.

This notice is being sent to you by [system].

State Water System ID#: \_\_\_\_\_. Date distributed: \_\_\_\_\_.

## Certification of Completion of Public Notification

This form, when completed and returned to the Division of Drinking Water - Stockton District (31 E. Channel Street, Room 270, Stockton, CA 95202), serves as certification that public notification to water users was completed as required by Title 22, California Code of Regulations, Sections 64463-64465.

**Public Water System Name:** \_\_\_\_\_

**Public Water System No.:** \_\_\_\_\_

Public notification for failure to comply with the Disinfection Byproduct Precursor Treatment Technique requirements was performed by the following method(s) (check and complete those that apply):

The notice was mailed to users on: \_\_\_\_\_  
A copy of the notice is attached.

The notice was hand delivered to water customers on: \_\_\_\_\_  
A copy of the notice is attached.

The notice was published in the local newspaper on: \_\_\_\_\_  
A copy of the newspaper notice is attached.

The notice was published in conspicuous places on: \_\_\_\_\_  
A copy of the notice is attached.  
A list of locations the notice was posted is attached.

The notice was delivered to community organizations on: \_\_\_\_\_  
A copy of the notice is attached.  
A list of community organizations the notice was delivered to is attached.

I hereby certify that the above information is factual.

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Disclosure:** Be advised that Section 116725 and 116730 of the California Health and Safety Code state that any person who knowingly makes any false statement on any report or document submitted for the purpose of compliance with the attached order may be liable for a civil penalty not to exceed five thousand dollars (\$5,000) for separate violation each day that the violation continues. In addition, the violators may be prosecuted in criminal court and, upon conviction, be punished by a fine of not more than \$25,000 for each day of violation, or be imprisoned in the county jail not to exceed one year, or by both the fine and imprisonment.

Due to the Division of Drinking Water within 10 days of issuance of notice to customers  
System Number: \_\_\_\_\_  
Enforcement Action No. \_\_\_\_\_

# Quarterly Progress Report

Water System:	Water System No.:
Compliance Order No.:	Violation:
Calendar Quarter:	Date Prepared:

This form should be prepared and signed by Water System personnel with appropriate authority to implement the directives of the Compliance Order and the Corrective Action Plan. Please attach additional sheets as necessary. The quarterly progress report must be submitted by the 10th day of each subsequent quarter, to the Division of Drinking Water, Stockton District Office.

**Summary of Compliance Plan:**

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**Tasks completed in the reporting quarter:**

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**Tasks remaining to complete:**

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**Anticipated compliance date:**

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**Name**

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**Title**

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**Signature**

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**Date**